

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** subsection 25 (1) of the *Electricity Act, 1998*;

**AND IN THE MATTER OF** a submission by the Independent Electricity System Operator to the Ontario Energy Board for the review of its proposed expenditure and revenue requirements for the fiscal year 2022 and the fees it proposes to charge during the fiscal year 2022.

**NOTICE OF INTERVENTION**

**OF THE**

**SCHOOL ENERGY COALITION**

1. The School Energy Coalition (“SEC”) applies for intervenor status in this proceeding.
2. SEC is a frequent intervenor in Board proceedings. Our current Annual Filing can be found on the Board’s website, here:

<https://www.rds.oeb.ca/CMWebDrawer/Record/737250/File/document>

3. The School Energy Coalition intends to apply for recovery of its costs reasonably incurred in the course of its intervention in this matter. SEC has participated in many past natural gas and electricity proceedings in Ontario, including consultations, rate cases, and other processes and hearings, and has been found eligible to be paid its reasonably incurred costs in all of those proceedings.

**Issues to be Addressed**

4. SEC’s intended participation will include the following:
  - a. The Applicant’s proposed 2022 expenditures and revenue requirements;
  - b. The proposed usage fees and other fees;
  - c. Alignment of the IESO Business Plan with its application, including the Corporate Performance Measures;
  - d. Cost Allocation of IESO costs between domestic and export customers;
  - e. Compliance with the terms of previous approved settlement proposals;
  - f. Proposed disposition of various deferral and variance accounts; and
  - g. Generally, to represent the interests of school boards and their students in this process.

**The Intervenor’s Intended Participation**

5. SEC intends to participate in any pre-hearing procedures, including interrogatories or technical conferences, and settlement conferences. SEC also intends to participate in any oral hearings of this matter, and in written or oral submissions, as well as any other parts of the process that the Board should order. While SEC does not currently intend to file evidence in this proceeding, it

reserves its right to do so depending on the responses to interrogatories and any other discovery processes ordered by the Board.

**Nature of Hearing Requested**

6. Until interrogatories have been answered, we believe it is premature to assess whether a written or an oral hearing is more appropriate in this proceeding.

**Counsel/Representative**

7. SEC requests that a copy of all documents filed with the Board by each party to this proceeding be served on the intervenor, and on the intervenor's counsel, as follows:

- a. School Energy Coalition: (electronic copies only)

**ONTARIO EDUCATION SERVICES CORPORATION**  
**c/o Ontario Public School Boards Association**  
439 University Avenue, 18<sup>th</sup> Floor  
Toronto, ON  
M5G 1Y8

Attn: Ted Doherty, Executive Director  
Phone: 416-340-2540  
Fax: 416-340-7571  
Email: [SEC@oesc-cseo.org](mailto:SEC@oesc-cseo.org)

- b. SEC's counsel: (electronic copies only)

**SHEPHERD RUBENSTEIN PROFESSIONAL CORPORATION**  
2200 Yonge Street, Suite 1302  
Toronto, Ontario, M4S 2C6

Attn: Mark Rubenstein  
Phone: 647-483-0113  
Fax: 416-438-3305  
Email: [mark@shepherdrubenstein.com](mailto:mark@shepherdrubenstein.com)

With an electronic copy to:

Attn: Fred Zheng  
Phone: 647-483-0114  
Email: [fred@shepherdrubenstein.com](mailto:fred@shepherdrubenstein.com)

Respectfully, submitted on behalf of the School Energy Coalition this March 29, 2022.

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Mark Rubenstein  
Counsel for the School Energy Coalition